

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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MOHAMMED GARADI, et al.,

Plaintiffs,

-against-

**DISCOVERY PLAN
WORKSHEET**

MARS WRIGLEY CONFECTIONERY US, LLC.,

1:19-cv-03209-RJD-ST

Defendant.

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[PROPOSED] DISCOVERY PLAN

Phase I (Pre-Settlement Discovery)	
Deadline for completion of Rule 26(a) initial disclosures and HIPAA-compliant records authorizations:	The parties are working to resolve this matter and have informally exchanged information. Defendant has sought leave to file a motion to dismiss the original complaint under Rule 12 of the Federal Rules of Civil Procedure. Plaintiffs have requested leave to file an amended complaint. To facilitate resolution of this matter, the parties jointly wish to stay discovery ¹ until after the later of Defendant's answer to the amended complaint or a motion to dismiss the amended complaint is filed and decided.
Completion date for Phase I Discovery as agreed upon by the parties: <i>(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)</i>	TBD
Date for initial settlement conference:	TBD

¹ *Bar-Mashiah v. Inc. Village of Hewlett Bay Park*, CV 18-4633 (AKT), 2019 WL 4247593, at *2 (E.D.N.Y. Sep. 6, 2019) (noting decision to grant joint motion to stay discovery “pending motion to stay discovery pending a resolution of the motions to dismiss.”).

<i>(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)</i>	
Phase II (Discovery and Motion Practice)	
Motion to join new parties or amend the pleadings: <i>(Presumptively 15 days post initial settlement conference)</i>	TBD
First requests for production of documents and for interrogatories due by: <i>(Presumptively 15 days post joining/amending)</i>	TBD
Class Certification discovery completed by: <i>(Presumptively 3 months post first requests for documents/interrogatories)</i>	TBD
All fact discovery completed by: <i>(Presumptively 3.5 months post after issuance of any decision on class certification)</i>	TBD
Staggered Exchange of expert reports completed by: <i>(Presumptively 30 days post fact discovery)</i>	TBD
Expert depositions completed by: <i>(Presumptively 30 days post expert reports)</i>	TBD
COMPLETION OF ALL DISCOVERY BY: <i>(Presumptively 9 months after Initial Conference)</i>	TBD
Final date to take first step in dispositive motion practice: <i>(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)</i>	TBD
Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?	Yes

Respectfully Submitted,

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